

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50.

Defendants.

Civil Action No.  
1:22-cv-00187-LJV-JJM

**DECLARATION OF  
ARMAN ZAHOORY  
IN SUPPORT OF  
MOTION TO SEAL**

I, Arman Zahoory, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel to Defendant Skyrise, Inc.  
I am familiar with this matter and the facts set forth herein.

2. I submit this Declaration in support of Skyrise's Motion to Seal, which seeks an  
order permitting the filing under seal of limited excerpts of the Declaration of C. Douglass Locke,  
Ph.D. filed in support of Skyrise's August 17, 2022 Opposition to Moog's Motion to compel  
Discovery Necessary for Further Trade Secret Identification.

3. Limited portions of the Declaration of C. Douglass Locke, Ph.D. expressly identify  
file paths and file names contained in devices produced to iDS, which are presumptive designated  
as "OUTSIDE COUNSEL AND ATTORNEYS' EYES ONLY" under the iDS Protocol. The  
proposed redactions are narrowly tailored to protect such information.

Dated: August 17, 2022



Arman Zahoory